

Guidelines on Natural, Naturally Raised, Feed, Antibiotic and Hormone Claims

Background

In recent years, the marketplace has seen an increase in the use of claims such as “natural”, “grain-fed”, “fed no animal products and by-products”, “raised without the use of hormones”, “raised without the use of antibiotics”, on meat, poultry and fish products. In the absence of specific regulations on the use of claims that describe how animals were raised or what they were fed on food labels and advertising, the Canadian Food Inspection Agency (CFIA) has developed interpretive guidance to support Subsection 5.(1) of the *Food and Drugs Act* (FDA) and Section 7 of the *Consumer Packaging and Labelling Act* (CPLA) to promote clear and truthful labelling.

The guidelines include criteria for a number of such claims found in labelling and advertising. The list is not exhaustive and similar claims, including brand names, trademarks, and images, may be assessed using the principles outlined below. It is important to note that these guidelines do not include organic claims, which fall under the *Organic Products Regulations* of the *Canada Agricultural Products Act*.

The guidelines were developed taking into consideration the results of broad stakeholder consultation, public opinion research findings through an EKOS Research telephone survey, and review of the policies of other countries. For some of the relevant legislation and the guiding principles for the federal food labelling and advertising system, see Annexes 1 and 2.

Definitions

The following definitions, found in the legislation that govern the labelling and advertising of foods in Canada, are helpful in the reading of this guideline. Each includes a reference to the legislation it comes from.

Advertisement¹: includes any representation by any means whatever for the purpose of promoting directly or indirectly the sale or disposal of any food, drug, cosmetic or device.

Animal by-product²: includes blood or any of its components, bones, bristles, feathers, flesh, hair, hides, hoofs, horns, offal, skins and wool, and anything containing any of those things.

Animal product²: includes cream, eggs, milk, non-fertilized ova and semen.

¹ Food and Drugs Act

² From Health of Animals Act

Antibiotic³: is any drug or combination of drugs such as those named in C.01.401 to C.01.592 which is prepared from certain micro-organisms, or which formerly was prepared from micro-organisms but is now made synthetically and which possesses inhibitory action on the growth of other micro-organisms.

Label¹: includes any legend, word or mark attached to, included in, belonging to or accompanying any food, drug, cosmetic, device or package.

Marine and fresh water animal³: is (a) fish, (b) crustaceans, molluscs, other invertebrates, (c) marine mammals, and (d) frogs.

Principal display panel³: generally means that part of a label applied to the principal display surface, which is the side or surface of a container that is displayed or visible under normal or customary conditions of sale or use. For more specific details refer to the Consumer Packaging and Labelling Regulations.

Grain⁴: means barley, beans, buckwheat, canola, chick peas, corn, fababeans, flaxseed, lentils, oats, peas, rice, rye, safflower seed, sorghum, soybeans, sunflower seed, triticale and wheat or any of their by-products.

The Guidelines

I. NATURAL CLAIMS

Foods or ingredients of foods submitted to processes that have significantly altered their chemical, physical, or biological state should not be described as natural.

"Natural" can generally be understood as meaning:

- a natural food or ingredient of a food is not expected to contain, or to ever have contained, an added vitamin, added mineral nutrient, artificial flavouring agent, or food additive;
- a natural food or ingredient of a food does not have any constituent or fraction thereof removed or significantly changed, except the removal of water; and/or
- a natural food or ingredient of a food that has been produced through the ordinary course of nature without the interference or influence of humans.

The CFIA will not object to “natural” and “naturally raised” claims provided they are factual and not misleading, as per Subsection 5.(1) of the *Food and Drugs Act* (FDA) and Section 7 of the *Consumer Packaging and Labelling Act* (CPLA).

³ Food and Drug Regulations

⁴ Canada Grain Act

With respect to a meat, poultry, or fish product, “natural” and “naturally raised” claims are considered acceptable only on products that were raised with minimal human intervention, for example, wild turkey or wild fish. To raise animals so that their products can be labelled as “natural” would be very difficult as most animals receive vaccination or medication and the feed given usually contains vitamins, minerals, additives, medication and direct fed microbials; none of which are considered to be minimal human interventions. To claim on a product label “naturally raised” would be even more difficult, as raising a farm animal or fish is an expression of human intervention.

When a “natural” or “naturally raised” claim cannot be made, there may be other, more specific claims which convey information on the methods used to raise a particular animal or fish, provided they are truthful and not misleading; for example, “grain fed”, “raised without the use of antibiotics” or “raised without the use of hormones”. The following three sections provide the criteria established for a number of claims related to how animals or fish are raised or fed.

II. FEED CLAIMS

Generally, claims regarding the feed that animals and fish have been raised on are acceptable provided the claims are factual, not misleading, deceptive or likely to create an erroneous impression regarding the character, value, composition, merit, safety or method of production. These guidelines provide criteria that support several different claims and their variations.

A) “Fed no” or “Raised without”: **animal products;
animal by-products;
animal fat;
animal meal; and/or
bone meal.**

The above claims may only appear on meat, poultry, and fish products which were raised on feed free of ingredients or components of animal origin including animal products and animal by-products. To illustrate, a meat product labelled “fed no animal meal or bone meal” would be acceptable when the animal feed is free of all ingredients or components of animal origin. This includes supplemental sources of minerals and vitamins as well as non-nutritive feed additives that contain animal products, such as Vitamin D3 derived from the lanolin of sheep wool and vitamins and minerals which are encapsulated in gelatin of animal origin. Animal feed manufactured with bakery and snack food waste which contains animal products as well as animal by-products will also limit the use of such claims on the resulting meat product.

It should be noted that it is understood that the animals subject to the feed claims, except for chicken and fish, were nourished with their mothers’ milk. This milk is not taken into consideration when evaluating a claim for the absence of animal products and animal by-products in the animal’s diet.

B) “Grain-fed”, “Vegetable grain-fed”

These claims are considered synonymous and are acceptable on food products derived from animals which were fed a grain diet, where the macro feed ingredients, added as sources of energy and protein, are made up solely of grains and grain by-products with no ingredients of animal origin. Minerals and vitamins as well as non-nutritive feed additives such as medications, biologics, pellet binders, enzyme supplements, anti-caking agents, flavouring agents, etc., may be added regardless of origin.

In other words, unlike the “fed no animal products” claims above, additives such as Vitamin D3 derived from the lanolin of sheep wool and vitamins and minerals which are encapsulated in gelatin of animal origin may be added without disqualifying the final product from making the claims “grain fed” or “vegetable grain fed.”

C) “Grain-fed” or “Vegetable grain-fed” and:

- no animal products;**
- no animal by-products;**
- no animal fat;**
- no animal meal; and/or**
- no bone meal.**

These claims are considered synonymous and are a combination of the criteria for the claims in subsections A) and B) above. They are acceptable for food products derived from animals which were fed a grain-based diet, where the macro feed ingredients, added as sources of energy and protein, are made up solely of grains and grain by-products with no ingredients from animal origin. The diet can contain other ingredients normally found in feed, including minerals, vitamins, veterinary drugs and preservatives, but these also cannot contain ingredients of animal origin.

For example, “grain-fed and no animal meal” or “vegetable grain-fed, no bone meal or animal fat” may be acceptable when the feed grain-based and free of ingredients or components of animal origin. This includes, for example, Vitamin D3 derived from the lanolin of sheep wool, and vitamins and minerals which are encapsulated in gelatin of animal origin. Animal feed manufactured with bakery and snack food waste which contains animal products as well as animal by-products will also limit the use of such claims on the resulting meat product.

D) “Raised on feed that includes grains”, “Feed includes grains”

These claims could be used to describe products from animals that were raised on feed which included grains and grain by-products but was not exclusively limited to grains. Other acceptable feed ingredients such as hay, ingredients derived from animal products, or animal by-products may also be present.

The words “includes grains” communicates to the consumer that the animals were fed a diet

which was not exclusively made up of grains and could contain other feed ingredients such as hay, animal products and/or animal by-products.

E) “Raised on feed that includes grains” and: **no animal products;**
 no animal by-products;
 no animal fat;
 no animal meal; and/or
 no bone meal.

These claims, a combination of the criteria from subsections A) and D), could be used to describe animals that were raised on feed which included grains and grain by-products but was not made exclusively from grains. For example, the feed could contain a mixture of hay and grains, where hay traditionally is not considered a grain.

In addition, the feed cannot contain ingredients of animal origin. Claims such as “raised on feed that includes grains and no animal meal” or “raised on feed that includes grains and no bone meal or animal fat” for example, would only be permitted when the feed includes grains and is free of ingredients or components of animal origin. This includes supplemental sources of minerals and vitamins as well as non-nutritive feed additives that contain animal products, such as Vitamin D3 derived from the lanolin of sheep wool and vitamins and minerals which are encapsulated in gelatin of animal origin. Animal feed manufactured with bakery and snack food waste which contains animal products as well as animal by-products will also limit the use of such claims on the resulting meat product.

F) “X% Grain-fed”

Similar to the “raised on feed that includes grains” claim in subsection D), this claim can be used to describe products from animals which were raised on a diet which includes grains and grain by-products but is not exclusively made from grains. Other feed ingredients such as hay, or ingredients derived from animal products or animal by-products may also be present. The percentage of grain in the total amount of feed would specifically indicate the proportion of the feed that is made up of grains and tell consumers that the feed the animals were raised on contained ingredients other than grain.

G) “X% Grain-fed” and: **no animal products;**
 no animal by-products;
 no animal fat;
 no animal meal; and/or
 no bone meal.

These claims are a combination of the criteria in subsections A) and F). They describe the diet of an animal where the macro feed ingredients include an identified amount of grains and grain by-products but is not limited to grains, and contains no ingredients of animal origin. Therefore,

other feed ingredients such as hay may also be present.

Claims such as “X% grain fed and no animal meal” or “X% grain fed and no bone meal or animal fat” for example, would only be permitted when the feed is free of ingredients or components of animal origin. As in subsection A), this includes supplemental sources of minerals and vitamins as well as non-nutritive feed additives that contain animal products, such as Vitamin D3 derived from the lanolin of sheep wool and vitamins and minerals which are encapsulated in gelatin of animal origin. Animal feed manufactured with bakery and snack food waste which contains animal products as well as animal by-products will also limit the use of such claims on the resulting meat product.

III. RAISED WITHOUT THE USE OF ANTIBIOTICS

To reduce antibiotic residues, there is a specific period of withdrawal of antibiotic use in animals prior to their entering the food chain. Distinct from that, the following criteria describes meat, fish, and poultry products that have never been fed or treated with antibiotics.

In order to display the claim “raised without the use of antibiotics” the animal or fish must not have received antibiotics from birth to harvest. In addition, no antibiotics can be administered to the mother of the animal in question in any manner which would result in antibiotic residue in the animal. Vitamins and minerals given to the animal may only be given at the level of physiological action for dietary supplement, not for antimicrobial effect.

Animals and fish products raised without the following substances would be considered eligible to make the claim “raised without the use of antibiotics” (other substances will be evaluated as required):

- Drugs such as:
 - ▶ monensin sodium
 - ▶ virginiamycin
 - ▶ sulfa drugs
 - ▶ arsenicals
 - ▶ anticoccidial drugs, including ionophores⁵

However, the following are permitted in the production of foods of animal or fish origin labelled “raised without the use of antibiotics” claims (other substances will be evaluated as required):

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Health Canada’s Veterinary Drug Directorate considers ionophores as antibiotics and they are classified as Category IV anti-microbials because of their low importance in human medicine. Ionophores belong to antibiotics by the nature of both the antimicrobial activity and their microbial sources.

http://www.hc-sc.gc.ca/dhp-mps/consultation/vet/consultations/amr_ram_hum-med_e.html

- Veterinary biological products:
 - ▶ vaccines
 - ▶ antisera
 - ▶ colostrum
 - ▶ direct fed microbial products registered with CFIA as feed ingredients, for example Interbac

“Raised without the use of antibiotics” clearly states that no antibiotics were administered to the animals and is easily and clearly understood by consumers.

A claim like “fed no antibiotics” may imply that the animal was raised without the use of antibiotics, when, in fact, the animal may have received antibiotics through injection or spraying. To avoid misleading information, if such a claim is applied, it should meet the criteria for “raised without the use of antibiotics”.

IV. RAISED WITHOUT THE USE OF ADDED HORMONES

No hormones shall be administered in any way (including through the mother) to the animal that forms the food product carrying the claim “raised without the use of hormones” on the label or advertisement.

- 1) In cases where regulations permit the use of hormones and where none were used, the products from these animals could make the claim “raised without the use of hormones”.
- 2) For products that originated from animals for which the use of hormones is prohibited the claim “like other (naming the product or source animal) these (naming the product or source animal) were raised without the use of hormones”.

“Raised without the use of hormones” delivers a clear message that the animals were not given hormones. Consumers may not be aware that the use of hormones is only permitted with certain animals. Where hormones are not permitted, the phrase “like other animals” avoids false uniqueness between similar products and avoids the creation of an erroneous impression regarding the character and composition of the product.

Claims such as “hormone free” without any other information appearing on the label could create the impression that the meat in question does not contain hormones. As meat, poultry, and fish products contain naturally occurring hormones, the claim “hormone free” is incorrect and inaccurate and should not be used.

Claims for “no growth stimulants” may also be misleading for consumers. Hormones are considered growth stimulants as are low doses of antibiotics in feed. Some consider most of the ingredients in feed mixes such as grains, vitamins, and minerals to stimulate growth. With such a broad and diverse understanding of “growth stimulant”, the simple statement, “no growth

stimulants” could mean the absence of a number of substances and the presence of others, depending on the individual. As no criteria has been developed to define and evaluate such a claim, its use is not acceptable.

Application of the Guidelines

The use of claims on how animals or fish are raised or fed are voluntary. When applied to a food label or advertisement, however, they will be assessed based on the criteria outlined in these guidelines and any other relevant information. If considered to be false, misleading, deceptive or likely to create an erroneous impression, corrective action will be applied in a fair and responsible manner.

Annex 1 - Relevant Legislation

Food products sold in Canada must be labelled and advertised in a manner that is accurate and not misleading. The *Food and Drugs Act*, *Consumer Packaging and Labelling Act*, *Meat Inspection Act* and *Fish Inspection Act* contain sections which support accurate labelling.

The *Food and Drugs Act* (FDA), Subsection 5(1), states that:

No person shall label, package, treat, process, sell or advertise any food in a manner that is false, misleading, deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit, or safety.

The *Consumer Packaging and Labelling Act*, Section 7, states that:

7(1) No dealer shall apply to any prepackaged product or sell, import into Canada or advertise any prepackaged product that has applied to it a label containing any false or misleading representation that relates to or may reasonably be regarded as relating to that product.

7(2) For the purposes of this section, "false or misleading representation" includes:

b) any expression, word, figure, depiction or symbol that implies or may reasonably be regarded as implying that a prepackaged product contains any matter not contained in it or does not contain any matter in fact contained in it;

c) any description or illustration of the type, quality, performance, function, origin or method of manufacture or production of a prepackaged product that may reasonably be regarded as likely to deceive a consumer with respect to the matter so described or illustrated.

Meat Inspection Regulations, 1990, Section 94(7), states that:

No word, picture or design that conveys a false or misleading impression as to the contents, quality, quantity, weight, method or date of production or manufacture or place of origin of the contents of any meat product bearing the meat inspection legend shall be used on the label of or in connection with the meat product.

Fish Inspection Regulations, Section 27, states that:

No person shall package any fish or mark or label any container of fish in a manner that is false, misleading or deceptive.

Annex 2 - Guiding Principles for the Federal Food Labelling and Advertising System

The following are the principles that guide the development of consumer protection policy of the CFIA. These can be found in the Guide to Food Labelling and Advertising.

Policies will be developed in a responsible manner to ensure that federal food labelling policies and regulations:

- are necessary to protect health and safety and prevent product misrepresentation and fraud;
- promote an informed food choice, by providing consumers with reliable and comparable information, that reflects current food technology and nutrition recommendations and that can be easily understood;
- support marketplace equity and fair competition;
- respect obligations under international and federal provincial trade agreements; and
- do not entail costs of implementation that outweigh benefits to society.